

Kings

April 2, 2003

Country of Origin Labeling Program
Agricultural Marketing Services
US Department of Agriculture
Stop 0249, Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

To Whom It May Concern:

I am writing to give input on the Country of Origin Labeling regulations slated to become mandatory in Autumn of 2004. In my opinion, the regulations, as they now stand, approach the point of being impossible to implement.

Kings has implemented a modern and sophisticated scale label management system that is currently wholly unable to host and support the requirements of the regulations.

The requirements to label each ingredient in a combined product such as fruit salad with country of origin, and country of processing, is entirely unrealistic given the difficulty of record keeping, space for text available on labels, and the data transmission capabilities currently available to food retailers.

If these regulations are implemented as they currently stand, the financial implications will be oppressive. These costs, as always, will be borne by our customers who will pay more for products purchased in our stores. I believe these regulations have failed to achieve proper balance between the value of COOL information to customers and the cost they will ultimately pay for the information.

The record keeping requirements at store and headquarters level combined with the compliance burden placed on retailers is not achievable without a major re-structuring of the perishable food supply chain. I urge the USDA to re-consider these regulations before they become mandatory.

Sincerely,



Jim Kuscin

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